

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

In re SANDRIDGE ENERGY, INC.
SECURITIES LITIGATION

Case No. 5:12-cv-01341-G

This Document Relates To:

ALL ACTIONS.

**DEFENDANT SANDRIDGE ENERGY, INC.’S
FIRST SUPPLEMENTAL RESPONSES AND OBJECTIONS
TO LEAD PLAINTIFFS’ SECOND SET OF INTERROGATORIES**

Defendant SandRidge Energy, Inc. (“Defendant” or “SandRidge”) submits the following First Supplemental Responses and Objections to the following Interrogatories of Lead Plaintiffs’ Second Set of Interrogatories to nominal defendant SandRidge Energy, Inc. served on February 27, 2019. The responses and objections are based upon Defendant’s investigation to date and are issued without prejudice to and reserving Defendant’s right to further supplement its responses pursuant to Fed. R. Civ. P. 26(e).

Pursuant to the Court’s October 16, 2020 Order (ECF No. 532), and pursuant to FED.R.CIV.P. 26(g)(1) and 33(b)(5), SandRidge certifies that the answers to Interrogatory Nos. 10 and 13 may be determined from business records *already produced* and the burden of deriving or ascertaining the answers will be substantially the same for either party. However, SandRidge commissioned its former counsel COVINGTON & BURLING to re-activate the RELATIVITY database vendor and examine archived documents in additional efforts to obtain the information included in the below supplemental responses. This information is not new, but rather identifies more specifically which documents SandRidge believes may have information responsive to the two

Interrogatories at issue.

Based on its former counsel's search in RELATIVITY, no post-meeting summaries or meeting minutes (not agendas) for any referenced meetings including the meeting identified in Interrogatory No. 13 were found, and SandRidge is substantially certain that if such documents had existed they would have been identified and previously produced.

SPECIFIC OBJECTIONS AND RESPONSES

Without waiving or restricting any of its General or Specific Objections set forth in SandRidge's Responses and Objections to Lead Plaintiffs' Second Set of Interrogatories (the "Initial Responses and Objections"), SandRidge provides the following supplemental responses:

INTERROGATORY 10:

Identify all presentations made to SandRidge's Executive Committee during the Class Period concerning the status of SandRidge's reserves in the Mississippian, including, without limitation, the meetings described in ¶ 120 of the Complaint.

SUPPLEMENTAL RESPONSE TO INTERROGATORY 10:

SandRidge incorporates by reference its prior response set forth in the Initial Responses and Objections. Because the term "presentations" is not defined,¹ SandRidge understands "presentations" to refer to PowerPoint (or similar) presentations and slides. Subject to this construction and subject to and without waiving any of its specific and general objections,

¹ Plaintiffs incorrectly asserted in their motion to compel that "the term[] ... 'presentation[s]' came directly from SandRidge," and cited to the SandRidge Mississippian Trust I Registration Statement. ECF No. 464, at 13. Contrary to Plaintiffs' claim, the Trust I offering documents do not use the term "presentation" or "presentations" in this context. The offering documents state only that "[e]ach quarter, the Executive Vice President – Reservoir Engineering presents the status of SandRidge's reserves" *See* Trust I Prospectus 66. During the Class Period, the Executive Vice – Reservoir Engineering may have "present[ed] the status of SandRidge's reserves" through oral communication and other documents that did not take the form of "presentations."

SandRidge provides the following response:

Due to the passage of time and the fact that individuals with knowledge concerning this interrogatory are no longer employees of SandRidge, SandRidge can no longer identify all presentations which may have occurred as described in ¶ 120 of the Complaint, particularly any oral presentations not accompanied by documentation. However, based on a search of SandRidge's records, SandRidge believes that the documents listed in **Exhibit A**, which have been previously produced by it, are potentially responsive to this Interrogatory. SandRidge's former counsel did not observe any new or other documents potentially responsive to this Interrogatory.

SandRidge expressly reserves its right to amend this response based upon any testimony or documents introduced at trial or any other developments.

INTERROGATORY 13:

Identify all participants, presentations, documents and meeting minutes relating to the Mid-Year PUD Review meeting held on or around July 12, 2012, as referred to in SD-SECURITIES-0443266.

SUPPLEMENTAL RESPONSE TO INTERROGATORY 13:

SandRidge incorporates by reference its prior response set forth in the Initial Responses and Objections. Because the term "presentations" is not defined, SandRidge understands "presentations" to refer to PowerPoint (or similar) presentations and slides. Subject to this construction and subject to and without waiving any of its specific or general objections, SandRidge responds to Interrogatory No. 13 as follows:

Due to the passage of time and the fact that individuals with knowledge concerning this interrogatory are no longer employees of SandRidge, SandRidge can no longer identify all participants, presentations, documents, and meeting minutes, to the extent any exist, responsive to

this Interrogatory. However, based on a search of SandRidge's records, SandRidge believes that the documents listed in **Exhibit B**, which have previously been produced by it, are potentially responsive to this Interrogatory and/or may contain information responsive to this Interrogatory. SandRidge's former counsel did not observe any new or other documents potentially responsive to this Interrogatory.

SandRidge expressly reserves its right to amend this response based upon any testimony or documents introduced at trial or any other developments.

Dated: December 14, 2020

Respectfully submitted,

/s/ J Christopher Davis

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Exhibit A

SD-SECURITIES-0540730

SD-SECURITIES-0589359

SD-SECURITIES-0589466

SD-SECURITIES-0589655

SD-SECURITIES-0589981

Exhibit B

SD-SECURITIES-0134784	SD-SECURITIES-0428961
SD-SECURITIES-0134785	SD-SECURITIES-0428962
SD-SECURITIES-0296305	SD-SECURITIES-0428963
SD-SECURITIES-0295170	SD-SECURITIES-0428976
SD-SECURITIES-0296305	SD-SECURITIES-0428977
SD-SECURITIES-0296428	SD-SECURITIES-0428978
SD-SECURITIES-0296457	SD-SECURITIES-0428979
SD-SECURITIES-0296700	SD-SECURITIES-0429098
SD-SECURITIES-0297368	SD-SECURITIES-0429099
SD-SECURITIES-0297405	SD-SECURITIES-0429106
SD-SECURITIES-0297456	SD-SECURITIES-0442562
SD-SECURITIES-0302394	SD-SECURITIES-0442563
SD-SECURITIES-0428685	SD-SECURITIES-0443266
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